

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re: Methyl Tertiary Butyl Ether (“MTBE”)
Products Liability Litigation

Master File No. 1:00-1898 (DLC)

This document pertains to:

MDL 1358

*Commonwealth of Pennsylvania v. Exxon Mobil
Corporation, et al.*, Case No. 14-cv-06228 (DLC)

**DECLARATION OF LISA S. MEYER IN SUPPORT OF
MOVING DEFENDANTS’ MOTION FOR PARTIAL SUMMARY JUDGMENT FOR
LACK OF DEFENDANT IDENTIFICATION AT FOCUS SITES**

LISA S. MEYER, an attorney duly licensed to practice law in the State of Illinois and admitted pro hac vice in the United States District Court for the Southern District of New York, hereby declares pursuant to 28 U.S.C. § 1746 under penalty of perjury under the laws of the United States of America that the following is true and correct:

I am a partner of the law firm Eimer Stahl LLP, counsel for CITGO Petroleum Corporation and CITGO Refining and Chemicals Company L.P. in the above-captioned case, and I make this Declaration based on my personal knowledge.

I submit this Declaration in support of Moving Defendants’ Motion for Partial Summary Judgment for Lack of Defendant Identification at Focus Sites (the “Motion”) that is being filed concurrently herewith. This Declaration authenticates certain exhibits attached hereto and referenced in the Rule 56.1 Statement and Memorandum of Law filed concurrently with the Motion. The exhibits described below were prepared at my direction on or about May 2, 2025.

1. Attached as **Exhibit 1** is a true and correct copy of a list of the Moving Defendants.

2. Attached as **Exhibit 2** is a true and correct copy of a matrix, prepared by Defendants, that identifies the Moving and Nonmoving Defendants for each focus site.

3. Attached as **Exhibit 3** is a true and correct copy of the Declaration of Lisa Gerson, dated May 2, 2025, with supporting emails attached as Exhibits A through E.

4. Attached as **Exhibit 4** is a true and correct copy of relevant pages of the Expert Report of Scott Carr, Ph.D., dated May 24, 2021.

5. Attached as **Exhibit 5** is a true and correct copy of Exhibit 9A to the Expert Report of Scott Carr, Ph.D., dated May 24, 2021.

6. Attached as **Exhibit 6** is a true and correct copy of Exhibit 9B to the Expert Report of Scott Carr, Ph.D., dated May 24, 2021.

7. Attached as **Exhibit 7** is a true and correct copy of Exhibit 10 to the Expert Report of Scott Carr, Ph.D., dated May 24, 2021.

8. Attached as **Exhibit 8** is a true and correct copy of relevant transcript pages of the deposition of Scott Carr, Ph.D., taken on April 19, 2022.

9. Attached as **Exhibit 9** is a true and correct copy of relevant pages of the Expert Report of James Sweeney, Ph.D., dated May 24, 2021.

10. Attached as **Exhibit 10** is a true and correct copy of relevant pages of the Expert Report of Bruce Burke, dated March 8, 2021.

11. Attached as **Exhibit 11** is a true and correct copy of relevant transcript pages of the deposition of Bruce Burke, taken on November 8, 2021.

12. Attached as **Exhibit 12** is a true and correct copy of relevant transcript pages of the deposition of Bruce Burke, taken on November 9, 2021.

13. Attached as **Exhibit 13** is a true and correct copy of Plaintiff's Amended Responses and Objections to Defendants' First Set of Focus Site Contention Interrogatory No. 5, dated July 27, 2023.

14. Attached as **Exhibit 14** is a true and correct copy of Plaintiff's Responses and Objections to Defendants' First Set of Focus Site Contention Interrogatory, Nos. 5, 7-8 dated December 23, 2022.

15. Attached as **Exhibit 15** is a true and correct copy of a Letter from Michael Axline to William Stack, dated February 10, 2021, and Exhibits M & N thereto.

16. Attached as **Exhibit 16** is a true and correct copy of the Joint Letter to Judge Freeman, dated February 26, 2021 (ECF No. 602).

17. Attached as **Exhibit 17** is a true and correct copy of relevant transcript pages of the Status Conference held in the above-captioned matter, dated March 3, 2021.

18. Attached as **Exhibit 18** is a true and correct copy of Exxon Mobil Corporation and ExxonMobil Oil Corporation's Objections and Responses to Plaintiff's Site-Specific Contention Interrogatories, dated December 23, 2022.

19. Attached as **Exhibit 19** is a true and correct copy of a Letter from Molly Han to Lisa Gerson, dated April 29, 2025.

20. Attached as **Exhibit 20** is a true and correct copy of CITGO Petroleum Corporation and CITGO Refining and Chemicals Company L.P.'s Responses and Objections to Plaintiff's First Set of Interrogatories and Requests for Production of Documents, dated April 4, 2018.

21. Attached as **Exhibit 21** is a true and correct copy of Sunoco Defendants' Responses and Objections to Plaintiff's First Set of Interrogatories and Requests for Production of Documents and Attachment A, dated March 28, 2018.

22. Attached as **Exhibit 22** is a true and correct copy of a Letter from Daniel Krainin to Duane Miller and Michael Axline, dated August 17, 2015.

23. Attached as **Exhibit 23** is a true and correct copy of relevant transcript pages of the Rule 30(b)(6) deposition of Dean Richard Stanton, taken on September 24, 2020.

24. Attached as **Exhibit 24** is a true and correct copy of relevant transcript pages of the Rule 30(b)(6) deposition of Roy Andrew Williams, taken on September 24, 2020.

25. Attached as **Exhibit 25** is a true and correct copy of Shell Defendants' Objections and Responses to Plaintiff's Amended First Set of Site-Specific Interrogatories and Requests for Production of Documents, dated September 4, 2019.

26. Attached as **Exhibit 26** is a true and correct copy of the Declaration of Robert A. Nocco, dated May 13, 2021.

27. Attached as **Exhibit 27** is a true and correct copy of the Declaration of Pennzoil-Quaker State Co. Pursuant to CMO 4(III)(B)(2) and Exhibit A, dated November 30, 2017.

28. Attached as **Exhibit 28** is a true and correct copy of relevant transcript pages of the Rule 30(b)(6) deposition of Helen Doherty, taken on January 22, 2020.

29. Attached as **Exhibit 29** is a true and correct copy of Exhibit 3 to the Rule 30(b)(6) deposition of Helen Doherty, taken on January 22, 2020.

30. Attached as **Exhibit 30** is a true and correct copy of relevant pages of the Expert Report of Fred Baldassare, dated June 21, 2021.

31. Attached as **Exhibit 31** is a true and correct copy of CITGO Petroleum Corporation and CITGO Refining and Chemicals Company L.P.'s Responses and Objections to Plaintiff's Tenth Set of Interrogatories and Requests for Production of Documents to Defendants Regarding Liability, dated January 7, 2021.

32. Attached as **Exhibit 32** is a true and correct copy of Chevron Defendants' Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production Regarding Certain Focus Sites, dated August 30, 2021.

33. Attached as **Exhibit 33** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 01, dated July 31, 2023.

34. Attached as **Exhibit 34** is a true and correct copy of Cumberland Farm Inc.'s Responses and Objections to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 01, dated October 1, 2021.

35. Attached as **Exhibit 35** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of documents Regarding Focus Site 02, dated July 31, 2023.

36. Attached as **Exhibit 36** is a true and correct copy of Cumberland Farm Inc.'s Responses and Objections to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production Regarding Focus Site 02, dated October 1, 2021.

37. Attached as **Exhibit 37** is a true and correct copy of Guttman Realty Company's Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 03, dated August 30, 2021.

38. Attached as **Exhibit 38** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 03, dated July 31, 2023.

39. Attached as **Exhibit 39** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Responses to Plaintiff's' First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 04, dated August 30, 2021.

40. Attached as **Exhibit 40** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 04, dated July 31, 2023.

41. Attached as **Exhibit 41** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Responses to Plaintiff's' First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 05, dated August 30, 2021.

42. Attached as **Exhibit 42** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 05, dated July 31, 2023.

43. Attached as **Exhibit 43** is a true and correct copy of ConocoPhillips Defendants' Responses to Plaintiff's Requests for Admission, Interrogatories, and Requests for Production of Documents Regarding Focus Site 05, dated August 30, 2021.

44. Attached as **Exhibit 44** is a true and correct copy of relevant transcript pages of the Rule 30(b)(6) deposition of Jolie Rhinehart, taken on November 11, 2020.

45. Attached as **Exhibit 45** is a true and correct copy of ConocoPhillips Defendants' Second Amended Responses to Plaintiff's First Set of Special Interrogatories, dated June 15, 2021.

46. Attached as **Exhibit 46** is a true and correct copy of Shell Defendants' Amended Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 05, dated September 15, 2023.

47. Attached as **Exhibit 47** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Amended Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 06, dated August 30, 2021.

48. Attached as **Exhibit 48** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 06, dated July 31, 2023.

49. Attached as **Exhibit 49** is a true and correct copy of ConocoPhillips Defendants' Responses to Plaintiff's Requests for Admission, Interrogatories, and Requests for Production of Documents Regarding Focus Site 06, dated August 30, 2021.

50. Attached as **Exhibit 50** is a true and correct copy of Shell Defendants' Amended Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 06, dated September 15, 2023.

51. Attached as **Exhibit 51** is a true and correct copy of Sunoco Defendants' Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 07, dated September 29, 2021.

52. Attached as **Exhibit 52** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 07, dated July 31, 2023.

53. Attached as **Exhibit 53** is a true and correct copy of Exxon Mobil Corporation and ExxonMobil Oil Corporation's Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 08, dated June 17, 2021.

54. Attached as **Exhibit 54** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 08, dated July 31, 2023.

55. Attached as **Exhibit 55** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 09, dated July 31, 2023.

56. Attached as **Exhibit 56** is a true and correct copy of CITGO Petroleum Corporation and CITGO Refining and Chemicals Company L.P.'s Supplemental and Amended Responses and Objections to Plaintiff's Amended First Set of Site-Specific Requests for Production of Documents to Defendants, dated August 30, 2021.

57. Attached as **Exhibit 57** is a true and correct copy of Shell Defendants' Amended Objections and Responses to Plaintiff's Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 09, dated September 15, 2023.

58. Attached as **Exhibit 58** is a true and correct copy of Plaintiff's Responses and Objections to Exxon Mobil Corporation and ExxonMobil Oil Corporation's Second Set of Requests for Admission to Plaintiff with Interrogatories and Requests for Production, dated September 13, 2021.

59. Attached as **Exhibit 59** is a true and correct copy of United Refining Company's Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 10, dated August 30, 2021.

60. Attached as **Exhibit 60** is a true and correct copy of United Refining Company's Responses and Objections to Plaintiff's Amended First Set of Site-Specific Interrogatories and Requests for Production of Documents, dated October 4, 2019.

61. Attached as **Exhibit 61** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 10, dated July 31, 2023.

62. Attached as **Exhibit 62** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 11, dated August 30, 2021.

63. Attached as **Exhibit 63** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 11, dated July 31, 2023.

64. Attached as **Exhibit 64** is a true and correct copy of ConocoPhillips Defendants' Responses to Plaintiff's Requests for Admission, Interrogatories, and Requests for Production of Documents Regarding Focus Site 11, dated August 30, 2021.

65. Attached as **Exhibit 65** is a true and correct copy of relevant transcript pages of the Rule 30(b)(6) deposition of Michael Stefanic Regarding Focus Site 11, taken on June 24, 2021.

66. Attached as **Exhibit 66** is a true and correct copy of Petroleum Products Corporation's Responses to Plaintiff's First Set of Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 11, dated July 30, 2021.

67. Attached as **Exhibit 67** is a true and correct copy of Getty Properties Corporation's Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 12, dated August 30, 2021.

68. Attached as **Exhibit 68** is a true and correct copy of Plaintiff's Second Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 12, dated July 31, 2023.

69. Attached as **Exhibit 69** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 16, dated August 30, 2021.

70. Attached as **Exhibit 70** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 16, dated July 31, 2023.

71. Attached as **Exhibit 71** is a true and correct copy of Guttman Realty Company's Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 17, dated August 30, 2021.

72. Attached as **Exhibit 72** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 17, dated July 31, 2023.

73. Attached as **Exhibit 73** is a true and correct copy of Hess Corporation's Objections and Responses to Plaintiff's First Set of Special Requests for Admission, Interrogatories and Requests for Production of Documents Regarding Focus Site 18, dated August 30, 2021.

74. Attached as **Exhibit 74** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 18, dated July 31, 2023.

75. Attached as **Exhibit 75** is a true and correct copy of Shell Defendants' Amended Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 18, dated September 15, 2023.

76. Attached as **Exhibit 76** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 19, dated August 30, 2021.

77. Attached as **Exhibit 77** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 19, dated July 31, 2023.

78. Attached as **Exhibit 78** is a true and correct copy of Shell Defendants' Amended Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 20, dated September 15, 2023.

79. Attached as **Exhibit 79** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 20, dated July 31, 2023.

80. Attached as **Exhibit 80** is a true and correct copy of Sunoco Defendants' Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 21, dated September 29, 2021.

81. Attached as **Exhibit 81** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 21, dated July 31, 2023.

82. Attached as **Exhibit 82** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 22, dated July 31, 2023.

83. Attached as **Exhibit 83** is a true and correct copy of Cumberland Farm Inc.'s Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 22, dated October 1, 2021.

84. Attached as **Exhibit 84** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 23, dated July 31, 2023.

85. Attached as **Exhibit 85** is a true and correct copy of Shell Defendants' Amended Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 23, dated September 15, 2023.

86. Attached as **Exhibit 86** is a true and correct copy of Gulf Oil Limited Partnerships Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 23, dated October 1, 2021.

87. Attached as **Exhibit 87** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 24, dated August 30, 2021.

88. Attached as **Exhibit 88** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 24, dated July 31, 2023.

89. Attached as **Exhibit 89** is a true and correct copy of Sunoco Defendants' Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 25, dated September 29, 2021.

90. Attached as **Exhibit 90** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 25, dated July 31, 2023.

91. Attached as **Exhibit 91** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Objections and Responses to Plaintiff's First Set of Special

Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 27, dated August 30, 2021.

92. Attached as **Exhibit 92** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 27, dated July 31, 2023.

93. Attached as **Exhibit 93** is a true and correct copy of United Refining Company's Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 28, dated August 30, 2021.

94. Attached as **Exhibit 94** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 28, dated July 31, 2023.

95. Attached as **Exhibit 95** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 34, dated July 31, 2023.

96. Attached as **Exhibit 96** is a true and correct copy of Cumberland Farm Inc.'s Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 34, dated October 1, 2021.

97. Attached as **Exhibit 97** is a true and correct copy of Sunoco Defendants' Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 34, dated September 29, 2021.

98. Attached as **Exhibit 98** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Responses to Plaintiff's First Set of Special Requests for

Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 35, dated August 30, 2021.

99. Attached as **Exhibit 99** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 35, dated July 31, 2023.

100. Attached as **Exhibit 100** is a true and correct copy of Shell Defendants' Amended Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 35, dated September 15, 2023.

101. Attached as **Exhibit 101** is a true and correct copy of Guttman Realty Company's Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 35, dated August 30, 2021.

102. Attached as **Exhibit 102** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 36, dated August 30, 2021.

103. Attached as **Exhibit 103** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 36, dated July 31, 2023.

104. Attached as **Exhibit 104** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 38, dated August 30, 2021.

105. Attached as **Exhibit 105** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 38, dated July 31, 2023.

106. Attached as **Exhibit 106** is a true and correct copy of Getty Properties Corporation's Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 38, dated August 30, 2021.

107. Attached as **Exhibit 107** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Amended Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 40, dated March 24, 2022.

108. Attached as **Exhibit 108** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 40, dated July 31, 2023.

109. Attached as **Exhibit 109** is a true and correct copy of CMW-PA-1504899, the Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Water Quality Management Registration of Storage Tanks form.

110. Attached as **Exhibit 110** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 41, dated July 31, 2023.

111. Attached as **Exhibit 111** is a true and correct copy of Cumberland Farm Inc.'s Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 41, dated October 1, 2021.

112. Attached as **Exhibit 112** is a true and correct copy of Gulf Oil Limited Partnerships Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 41, dated October 1, 2021.

113. Attached as **Exhibit 113** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 43, dated August 30, 2021.

114. Attached as **Exhibit 114** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 43, dated July 31, 2023.

115. Attached as **Exhibit 115** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 44, dated August 30, 2021.

116. Attached as **Exhibit 116** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of documents Regarding Focus Site 44, dated July 31, 2023.

117. Attached as **Exhibit 117** is a true and correct copy of Exxon Mobil Corporation and ExxonMobil Oil Corporation's Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 44, dated June 17, 2021.

118. Attached as **Exhibit 118** is a true and correct copy of Guttman Realty Company's Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 45, dated August 30, 2021.

119. Attached as **Exhibit 119** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 45, dated July 31, 2023.

120. Attached as **Exhibit 120** is a true and correct copy of Exxon Mobil Corporation and ExxonMobil Oil Corporation's Objections and Responses to Plaintiff's Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 47, dated June 17, 2021.

121. Attached as **Exhibit 121** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 47, dated July 31, 2023.

122. Attached as **Exhibit 122** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 48, dated July 31, 2023.

123. Attached as **Exhibit 123** is a true and correct copy of Cumberland Farm Inc.'s Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 48, dated October 1, 2021.

124. Attached as **Exhibit 124** is a true and correct copy of Sunoco Defendants' Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 50, dated September 29, 2021.

125. Attached as **Exhibit 125** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 50, dated July 31, 2023.

126. Attached as **Exhibit 126** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 50, dated August 30, 2021.

127. Attached as **Exhibit 127** is a true and correct copy of Exxon Mobil Corporation and ExxonMobil Oil Corporation's Objections and Responses to Plaintiff's Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 51, dated June 17, 2021.

128. Attached as **Exhibit 128** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 51, dated July 31, 2023.

129. Attached as **Exhibit 129** is a true and correct copy of ConocoPhillips Defendants' Responses to Plaintiff's Requests for Admission, Interrogatories, and Requests for Production of Documents Regarding Focus Site 51, dated August 30, 2021.

130. Attached as **Exhibit 130** is a true and correct copy of the Site-Specific Expert Report of Peter Zeeb, Ph.D., dated January 7, 2022.

131. Attached as **Exhibit 131** is a true and correct copy of relevant transcript pages of the Rule 30(b)(6) deposition of Lauren Mapleton Regarding Focus Site 51, taken on July 21, 2021.

132. Attached as **Exhibit 132** is a true and correct copy of Exhibit 10 to the Rule 30(b)(6) deposition of Lauren Mapleton Regarding Focus Site 51, taken on July 21, 2021.

133. Attached as **Exhibit 133** is a true and correct copy of relevant transcript pages of the Rule 30(b)(6) deposition of Richard Burgan Regarding Focus Site 51, taken on July 19, 2021.

134. Attached as **Exhibit 134** is a true and correct copy of Exxon Mobil Corporation and ExxonMobil Oil Corporation's Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 52, dated June 17, 2021.

135. Attached as **Exhibit 135** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 52, dated July 31, 2023.

136. Attached as **Exhibit 136** is a true and correct copy of ConocoPhillips Defendants' Responses to Plaintiff's Requests for Admission, Interrogatories, and Requests for Production of Documents Regarding Focus Site 52, dated August 30, 2021.

137. Attached as **Exhibit 137** is a true and correct copy of Appendix B.28 to the Site-Specific Expert Report of Peter Zeeb, Ph.D., dated January 7, 2022.

138. Attached as **Exhibit 138** is a true and correct copy of relevant transcript pages of the Rule 30(b)(6) deposition of John Zatyczyc Regarding Focus Site 52, taken on June 15, 2021.

139. Attached as **Exhibit 139** is a true and correct copy of Exxon Mobil Corporation and ExxonMobil Oil Corporation's Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 54, dated June 17, 2021.

140. Attached as **Exhibit 140** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 54, dated July 31, 2023.

141. Attached as **Exhibit 141** is a true and correct copy of Shell Defendants' Amended Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 54, dated September 15, 2023.

142. Attached as **Exhibit 142** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 55, dated July 31, 2023.

143. Attached as **Exhibit 143** is a true and correct copy of Shell Defendants' Amended Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 57, dated September 15, 2023.

144. Attached as **Exhibit 144** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 57, dated July 31, 2023.

145. Attached as **Exhibit 145** is a true and correct copy of Exxon Mobil Corporation and ExxonMobil Oil Corporation's Objections and Responses to Plaintiff's Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 58, dated June 17, 2021.

146. Attached as **Exhibit 146** is a true and correct copy of Exxon Mobil Corporation and ExxonMobil Oil Corporation's Corrected Objections and Responses to Plaintiff's First Set of Site-Specific Interrogatories, dated June 18, 2020.

147. Attached as **Exhibit 147** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 58, dated July 31, 2023.

148. Attached as **Exhibit 148** is a true and correct copy of Exxon Mobil Corporation and ExxonMobil Oil Corporation's Objections and Responses to Plaintiff's Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 60, dated June 17, 2021.

149. Attached as **Exhibit 149** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 60, dated July 31, 2023.

150. Attached as **Exhibit 150** is a true and correct copy of ConocoPhillips Defendants' Responses to Plaintiff's Requests for Admission, Interrogatories, and Requests for Production of Documents Regarding Focus Site 60, dated August 30, 2021.

151. Attached as **Exhibit 151** is a true and correct copy of Appendix B.36 to the Site-Specific Expert Report of Peter Zeeb, Ph.D., dated January 7, 2022.

152. Attached as **Exhibit 152** is a true and correct copy of relevant transcript pages of the Rule 30(b)(6) deposition of John Zatyczyc Regarding Focus Site 60, taken on June 16, 2021.

153. Attached as **Exhibit 153** is a true and correct copy of relevant transcript pages of the Rule 30(b)(6) deposition of Richard Burgan Regarding Focus Site 60, taken on July 19, 2021.

154. Attached as **Exhibit 154** is a true and correct copy of Exxon Mobil Corporation and ExxonMobil Oil Corporation's Objections and Responses to Plaintiff's Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 61, dated June 17, 2021.

155. Attached as **Exhibit 155** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 61, dated July 31, 2023.

156. Attached as **Exhibit 156** is a true and correct copy of Sunoco Defendants' Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 62, dated September 29, 2021.

157. Attached as **Exhibit 157** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 62, dated July 31, 2023.

158. Attached as **Exhibit 158** is a true and correct copy of Exxon Mobil Corporation and ExxonMobil Oil Corporation's Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 64, dated June 17, 2021.

159. Attached as **Exhibit 159** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 64, dated July 31, 2023.

160. Attached as **Exhibit 160** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 66, dated July 31, 2023.

161. Attached as **Exhibit 161** is a true and correct copy of Sunoco Defendants' Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 67, dated September 29, 2021.

162. Attached as **Exhibit 162** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 67, dated July 31, 2023.

163. Attached as **Exhibit 163** is a true and correct copy of United Refining Company's Objections and Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 69, dated August 30, 2021.

164. Attached as **Exhibit 164** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of documents Regarding Focus Site 69, dated July 31, 2023.

165. Attached as **Exhibit 165** is a true and correct copy of Atlantic Richfield Company and BP Products North America Inc.'s Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories, and Requests for Production of Documents Regarding Focus Site 70, dated August 30, 2021.

166. Attached as **Exhibit 166** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 70, dated July 31, 2023.

167. Attached as **Exhibit 167** is a true and correct copy of Sunoco Defendants' Responses to Plaintiff's First Set of Special Requests for Admissions, Interrogatories and Requests for Production of Documents Regarding Focus Site 75, dated September 29, 2021.

168. Attached as **Exhibit 168** is a true and correct copy of Plaintiff's Amended Responses to Defendants' First Set of Focus Site Contention Interrogatories and Requests for Production of Documents Regarding Focus Site 75, dated July 31, 2023.

169. Attached as **Exhibit 169** is a true and correct copy of Chevron Defendants' Responses to CMO 119 Section III(A), dated December 31, 2015.

170. Attached as **Exhibit 170** is a true and correct copy of Chevron U.S.A. Inc.'s Objections and Responses to Plaintiff's Site-Specific Contention Interrogatories to Defendants, dated December 22, 2022.

171. Attached as **Exhibit 171** is a true and correct copy of Texaco Inc.'s Objections and Responses to Plaintiff's Site-Specific Contention Interrogatories to Defendants, dated December 22, 2022.

172. Attached as **Exhibit 172** is a true and correct copy of TRMI-H LLC's Objections and Responses to Plaintiff's Site-Specific Contention Interrogatories to Defendants, dated December 22, 2022.

173. Attached as **Exhibit 173** is a true and correct copy of Petroleum Products Corporation's Corporate Disclosure Statement, dated September 30, 2021.

174. Attached as **Exhibit 174** is a true and correct copy of a Letter from Molly Han to Lisa Gerson, dated April 23, 2025.

175. Attached as **Exhibit 175** is a true and correct copy of Plaintiff's Responses and Objections to Chevron Defendants' First Set of Special Requests for Admission, Interrogatories, and Requests for Production of Documents, dated September 10, 2021.

176. Attached as **Exhibit 176** is a true and correct copy of 2MDLCP00518203, Supplemental Agreement to Agreement of Purchase, Sale, and Assignment of Marketing Assets between Mobil Oil Corporation and Tosco Corporation.

177. Attached as **Exhibit 177** is a true and correct copy of 2MDLCP00518214, Exhibit A to the above referenced Supplemental Agreement to Agreement of Purchase, Sale, and Assignment of Marketing Assets between Mobil Oil Corporation and Tosco Corporation.

178. Attached as **Exhibit 178** is a true and correct copy of 2MDLCP00518234, Exhibit D to the above referenced Supplemental Agreement to Agreement of Purchase, Sale, and Assignment of Marketing Assets between Mobil Oil Corporation and Tosco Corporation.

179. Attached as **Exhibit 179** is a true and correct copy of CITGO Petroleum Corporation and CITGO Refining and Chemicals Company L.P.'s Responses and Objections to Plaintiff's First Set of Special Interrogatories to Defendants, dated July 28, 2015.

180. Attached as **Exhibit 180** is a true and correct copy of the Declaration Provided on behalf of CITGO Petroleum Corporation and CITGO Refining and Chemicals Company L.P. Pursuant to Case Management Order No. 119, dated December 17, 2015.

181. Attached as **Exhibit 181** is a true and correct copy of Gulf Oil Limited Partnership's Responses to CMO 4 Categories Pursuant to Case Management Order No. 119, dated September 29, 2015.

182. Attached as **Exhibit 182** is a true and correct copy of PAMDL1358GOLP-0011676, underlying data regarding customers and jobbers to which Gulf Oil Limited Partnership sold gasoline that was marked for delivery in Pennsylvania, as prepared in response to Case Management Order No. 119.

183. Attached as **Exhibit 183** is a true and correct copy of PAMDL1358GOLP-0011679, excerpts of underlying data from Gulf Oil Limited Partnership's billing system, as prepared in response to Case Management Order No. 119.

184. Attached as **Exhibit 184** is a true and correct copy of Exhibit 3 to the deposition of Charles Swokel, taken on May 22, 2019.

185. Attached as **Exhibit 185** is a true and correct copy of Pennsylvania Department of Environmental Resources ("DER") Preliminary Report for Groundwater Contamination, Fairview Water Company, dated September 25, 1992.

186. Attached as **Exhibit 186** is a true and correct copy of Plaintiff's Supplemental Responses and Objections to Defendants' First Set of Non-Site-Specific Interrogatories and Requests for Production of Documents, dated April 14, 2016.

187. Attached as **Exhibit 187** is a true and correct copy of CMW-PA-1665670, January 25, 2002 email correspondence transmitting the Association of State and Territorial Solid Waste Management Officials' "MTBE and Fuel Oxygenates Workgroup Newsletter" (Vol. 4, No. 3; Fall 2001).

188. Attached as **Exhibit 188** is a true and correct copy of CMW-PA-1665703, the Association of State and Territorial Solid Waste Management Officials' "MTBE and Fuel Oxygenates Workgroup Newsletter" (Vol. 4, No. 2; Summer 2001).

189. Attached as **Exhibit 189** is a true and correct copy of CMW-PA-0819777, April 2002 email correspondence transmitting *Inside EPA* article titled "Landmark Verdict Finds MTBE 'Defective' Affecting Future Cleanups."

190. Attached as **Exhibit 190** is a true and correct copy of CMW-PA-0814419, October 7, 2003 email correspondence transmitting various news articles.

191. Attached as **Exhibit 191** is a true and correct copy of CMW-PA-0910072, November 29, 2004 email correspondence transmitting a news article titled “Key MTBE Cases Consolidated To New York Federal Court.”

192. Attached as **Exhibit 192** is a true and correct copy of an excerpt from Plaintiff’s Privilege Log, dated October 7, 2016.

193. Attached as **Exhibit 193** is a true and correct copy of an excerpt from Plaintiff’s Privilege Log, dated August 7, 2017.

194. Attached as **Exhibit 194** is a true and correct copy of CITGO Petroleum Corporation and CITGO Refining and Chemicals Company L.P.’s Supplemental and Amended Responses and Objections to Plaintiff’s Amended First Set of Site-Specific Interrogatories to Defendants, dated August 30, 2021.

195. Attached as **Exhibit 195** is a true and correct copy of relevant transcript pages of the Rule 30(b)(6) deposition of Kenneth Tua regarding Focus Site 05, taken on May 7, 2021.

196. Attached as **Exhibit 196** is a true and correct copy of relevant transcript pages of the Rule 30(b)(6) deposition of Adam Ofstun regarding Focus Site 06, taken on May 25, 2021.

197. Attached as **Exhibit 197** is a true and correct copy of Exhibit 4 to the Rule 30(b)(6) deposition of Michael Stefanic regarding Focus Site 11, taken on June 24, 2021.

Executed on: May 2, 2025
Chicago, Illinois

/s/ Lisa S. Meyer
Lisa S. Meyer